IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION CIVIL ACTION NO. 3:14-CV-225-RJC-DCK

TITLE TRADING SERVICES USA, INC. § **§** § § § § Plaintiff, JOINT STIPULATION OF TITLE TRADING, COASTAL VS. MANAGEMENT LLC, AND MARC 8888888 PRESTON REGARDING ARINDAM KUNDU, COASTAL PRELIMINARY INJUNCTION MANAGEMENT LLC, MARC PRESTON, SYED SAIF ASHRAF, DEREK CHIU, and ELIOT T. SMITH, Defendants.

- 1. Pending before the Court is the Application of Title Trading Services USA, Inc. ("<u>Title Trading</u>," "<u>Title</u>" or "<u>Company</u>") for a Temporary Restraining Order, Preliminary Injunction and Limited Asset Freeze (the "<u>Application for Preliminary Injunction</u>").
- 2. Plaintiff Title Trading and Defendants Coastal Management LLC ("Coastal") and Marc Preston ("Preston") hereby stipulate to the entry of a Preliminary Injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure as to Coastal and Preston on the same terms and conditions as the Temporary Restraining Order entered by the Court on May 2, 2014.
- 3. The parties to this Stipulation agree that Coastal and Preston are not waiving, and expressly reserve, their right to object to personal jurisdiction in the case at bar. The parties further agree that by signing this Stipulation, neither Coastal nor Preston shall be deemed to have acknowledged any wrongdoing or liability to Title, and the Stipulation may not be used against any party to establish liability for the claims set forth in the pleadings. Lastly, nothing contained

herein precludes Coastal and Preston from challenging the terms of injunctive relief described herein or requesting the Court to terminate the injunction against them, nor does it elevate the burden required for such a challenge.

4. Further, Plaintiff Title Trading and Defendants Coastal and Preston agree that a bond in the amount of \$500 will serve as adequate security pursuant to Rule 65(c) of the Federal Rules of Civil Procedure.

Respectfully submitted this 30th day of May, 2014.

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CERTIFICATE OF SERVICE

I certify that on May 30, 2014, the foregoing document was served upon each of the Defendants via U.S. Mail postage prepaid:

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and to the following counsel of record who is registered on the CM/ECF system:

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Attorneys for Marc Preston and Coastal Management LLC

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